



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

1153242 - R8 SDMS

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466

INITIAL/FINAL CERCLA POLLUTION REPORT

LOVELL REFINERY SITE

Lovell, Wyoming

I. HEADING

Date: December 5, 1995
Site Name: Lovell Refinery
From: Johanna Miller, OSC
To: Max H. Dodson, Office of Ecosystems
Protection & Remediation
Subject: Lovell Refinery Site, Lovell, WY
POLREP No.: POLREP 1 and Final

II. BACKGROUND

Site No.: A2
Response Authority: CERCLA
CERCLIS No: WYD988866018
NPL Status: Not listed
Action Memo Status: Dated May 18, 1995, amended August 8, 1995
Start Date : September 6, 1995
Completion date: November 7, 1995

III. INCIDENT INFORMATION

A. Incident Category

Time Critical, Non-NPL, Fund-Lead

B. Preliminary Assessment Results

On January 31, 1995, the Wyoming Department of Environmental Quality (WDEQ) requested assistance from the Region VIII Environmental Protection Agency (EPA) Emergency Response Branch (ERB) in evaluating the oily sludges which appeared to be seeping into the wetlands below the Lovell Refinery Site (the Site). On February 7, 1995, the On-Scene Coordinator (OSC) mobilized an EPA Technical Assistance Team (TAT) to the Site under the auspices of the Oil Pollution Act of 1990 (Public Law 101-380). TAT was brought on-site to assist in collection of surface water, sediment, and soil samples in order to determine if petroleum contamination was being released from the abandoned refinery facility into wetlands adjacent to Sage Creek.

The OSC and TAT found the following wastes to be present at the Site:



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- ° Several unlined ponds and a concrete vault which contained oily liquids and sludges.
- ° Over ten above ground tanks which contained oily liquids and sludges.
- ° Considerable construction and metal debris, and pieces of insulation scattered throughout the Site.

As a part of the Site assessment TAT collected 5 samples of the insulation to determine their asbestos content. Results of the Asbestos Analysis by the TAT lab showed that 3 of the 5 samples had asbestos values greater than 1% (reportable quantity). The three with higher than reportable quantity values had asbestos values of 2%, 5%, and 35%. It thus became essential that this Site be considered for a CERCLA Removal Action in addition to the activities associated with the OPA Removal Action.

C. Situation

1. Site Location

The Site is located approximately 1.5 miles northwest of the town of Lovell, Wyoming. The developed portion of the property consists of approximately 49 acres. A refinery operated on the Site from the early 1930s to the mid 1950s. Various refining and oil recycling operations were conducted at the Site until the early 1990s.

Subsequent surveys of the Site conducted during the removal of oil revealed the presence of six unlined ponds, seventeen above ground storage tanks (ASTs) and several underground tanks and sumps which contained oily liquids and sludges. At least two of the ASTs were leaking. There was evidence of seepage from the ponds into the Sage Creek floodplain and wetlands which discharge into Sage Creek.

A considerable amount of construction and metal debris, pieces of insulation, and approximately seven drums containing CERCLA hazardous substances were scattered throughout the Site. It appears that the buildings and machinery were dismantled for scrap value and that insulation and other debris were discarded haphazardly.

2. Description of Threat

A probable threat of direct exposure to asbestos existed through the inhalation and ingestion of airborne asbestos particles and dust. Access to the Site was unrestricted; therefore, any trespasser could come in direct contact

with the asbestos. In addition, some of the asbestos was located near the ponds, tanks, and sumps which required cleanup under OPA authority. Disturbance of the asbestos by heavy equipment would be a hazard to the cleanup workers.

As with the asbestos, a direct contact threat existed with the drums of hazardous substances. The drums contained corrosives and flammable liquids and were located in areas where public access was unrestricted. Some of the drums had missing bung covers, making the risk of leakage high. Continued exposure to extreme weather would cause continued deterioration of the drums and a release of contaminants into the environment. Since some of the drums contained flammable liquids, the risk of fire was also high.

IV. RESPONSE INFORMATION

A. Removal Actions Completed

The following removal actions took place with respect to the CERCLA hazardous substances:

1. On September 6, 1995 Brickley Construction Company, Inc., a subcontractor to the Emergency Response Cleanup Services (ERCS) contractor, mobilized to the site. The asbestos containing materials were wetted, picked up, bagged, and disposed under authorization of the Wyoming Department of Environmental Quality in a special cell at the North Big Horn County SAN#1 landfill. Asbestos disposal was complete on September 20, 1995.
2. Drums containing hazardous substances were analyzed and overpacked if necessary. Transformers containing PCBs were containerized. On November 7, 1995 three drums containing PCBs were transported to EnviroSafe of Idaho. On this same date seven drums containing corrosive and flammable compounds were transported to ELTEX Chemical in Texas. The CERCLA Removal action was complete on November 7, 1995.

V. COST INFORMATION

	Amount Budgeted	Costs To Date	Amount Remaining
ERCs Contractor	\$220,000	\$190,073	\$ 29,927
TAT	\$ 15,000	\$ 11,488	\$ 3,512
EPA	\$ 25,000	\$ 6,200	\$ 18,800
Contingency	\$ 47,000	\$ 0	\$ 47,000

The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

VI. DISPOSITION OF WASTES

Waste stream	Medium	Quantity	Containment - Migration Control	On-site Treatment	Disposal
Flammable & Corrosive Liquids (Methanol/ Ammonia Bisulfite)	Liquid	5 gal	bulked or overpacked	none	off-site ELTEX Chemical TX
Flammable Liquids (Methanol/ Xylene/ Ethyl Benzene)	Liquid	110 gal	overpacked	none	off-site ELTEX Chemical TX
Sodium Hydroxide	Solid	55 gal	overpacked	none	off-site ELTEX Chemical TX
Flammable Liquids (Naptha/Water)	Liquid	55 gal	overpacked	none	off-site ELTEX Chemical TX
Polychlorinated Biphenyls	Solid	165 lbs.	containeri- zed	none	off-site Enviro- Safe of Idaho

All facilities were found to be compliant with EPA's Off-site rule prior to final shipments of waste.